

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

FILED
CLERK OF COURT
JUL 17 2 30 PM '05
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON

UNITED STATES

v.

PHILIP ALBERT

DEFENDANT, PHILIP ALBERT'S MOTION TO AMEND
CONDITIONS OF PRE-TRIAL RELEASE

Now comes the defendant, Philip J. Albert, Jr., through counsel, and moves this Court to amend the conditions of his pre-trial release to allow out of state travel for a specific and limited period of time.

As grounds therefore, the defendant states that out of state travel is necessary to accompany his daughter to visit her maternal grandparents who live in Hawaii. Defendant states that his travel destination will be limited to Kapolei, Hawaii from July 29, 2005 through August 12, 2005.

Pre-trial services and the Office of the United States Attorney has informed counsel for the defendant that there is no opposition to allowance of the within motion.

WHEREFORE, the defendant respectfully moves this Court to amend the conditions of his pre-trial release to allow travel to the State of Hawaii from July 29, 2005 through August 12, 2005.

Respectfully submitted,

Philip ALBERT
By his attorney,



John Andrews – BBO #554259
Marc R. Salinas – BBO #644655
ANDREWS & UPDEGRAPH, PC
70 Washington Street, Suite 212
Salem, MA 01970
(978) 740-6633

Certificate of Service

I hereby certify that on this day a true copy of the within document was served upon the attorney of record for the United States, AUSA David G. Tobin, United States Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, MA and a courtesy copy to Lisa Roland, Courtroom Clerk for Honorable Charles B. Swartwood, III, United States Magistrate Judge by mail, as well as to the following counsel of record:

Dated: 7/14/5



Marc R. Salinas – BBO #644655
Andrews & Updegraph, PC
70 Washington Street, Suite 212
Salem, MA 01970
(978) 740-6633